



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop St.
Denver, CO 90202-1129
<http://www.epa.gov/region08>

February 27, 2007

Ref: 8EPR-N

Walter C. Waidelich, Division Administrator
Federal Highway Administration
2520 West 4700 South
Suite 9A
Salt Lake City, UT 84118

John Njord, Executive Director
Utah Department of Transportation
4105 South 2700 West
Salt Lake City, UT 84119

Re: Comments on 100 East: 300
South (Logan) to 1200 South
(Providence), DEIS # 20060507

Dear Messrs: Waidelich and Njord:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Draft Environmental Impact Statement (DEIS): regarding proposed improvements to South Logan to Providence Transportation Corridor; 100 East: 300 South (Logan) to 1200 South (Providence), Utah. EPA recognizes the enormous task that Federal Highway Administration (FHWA) faces to address the growth and traffic congestion that occurs in rapidly growing areas and we appreciate the opportunity to comment.

More specific comments on this DEIS are attached. EPA has given this DEIS an EC-2 rating (Environmental Concerns-Information Needed). This "EC" rating means that environmental impacts are identified by EPA that should be avoided to fully protect the environment. The potential for significant environmental degradation could be reduced by choosing the Least Environmentally Damaging Preferred Alternative (Alternative 4) combined with mitigation measures for wetlands and floodplains, and air pollution (PM 2.5). Currently, Logan exceeds National Ambient Air Quality Standard (NAAQS) for PM 2.5 during winter months. The FEIS should analyze the estimated trends for PM 2.5 over the next 20-30 years, as they are expected to continue to exceed the PM 2.5 standard,

If you have any questions about these comments, please contact Robin Coursen of my staff at (303)312-6695. She will be the primary EPA contact for this project. We appreciate the working relationship we have established through the previous transportation projects and anticipate continued success working with you on this document.

Sincerely,

| /s/ Dana Allen
 for Larry Svoboda
 Director, NEPA Program
 Office of Ecosystems Protection and Remediation

Enclosure

cc: Edward Woolford, FHWA Utah Division
 Todd Emery, FHWA Utah Division
 Brad Humphreys, UDOT, Ogden

COMMENTS

Air Comments

PM 2.5 Specific Comments

The PM 2.5 standard was developed to protect human health. These fine particles have been linked to serious health problems for people with heart and lung disease.

- Table 3-13 should be changed to reflect the new PM 2.5 standards.
- Since the Logan area will be designated non attainment for PM 2.5, a chart is needed to show the inventory of the sources of PM 2.5 in the Logan area. This will allow the reader to understand the contribution of transportation sources to this problem. Also a summary of other projects that may increase transportation capacity should be included.
- The estimated trends in PM 2.5 over the next 20-30 years from all sources, including transportation, should be shown so the reader can understand the trends and their sources.
- The paragraph under table 4-5 on page 4-32 should be changed to reflect that Logan is exceeding the NAAQS for PM 2.5.

Other Comments:

- Table 4-5: Include in this table or an additional table showing the daily VMT for existing, 2030 no build, 2030 Alternative 3 and 4, and 2030 Alternative 2.
- Overall, while this project is small, the contribution to air pollution from transportation sources is considerable, and the contribution of all projects cumulatively is great.

Water Comments

- As concluded in the document, indirect impacts caused by this project could cause an increase in non point source runoff, erosion, storm water management issues, localized flooding, and pollution of waterways. The mitigation measures for water quality protection (storm water runoff and erosion control), wetlands, floodplains and cumulative air impacts have been described in the DEIS. However, the wetlands mitigation measures are left for development after coordination with the U.S. Army Corps of Engineers during the Section 404 permitting process. Wetland mitigation measure should be described in this document.

- EPA is concerned about the long term water quality impacts on Logan River and Spring Creek by increases of storm water runoff, non point source runoff and erosion. Of particular concern is the potential increase in sediment loads to Spring Creek, which is listed as a 303(d) water body (2006 Bear River Management Unit: Spring Creek and tributaries from confluence with Little Bear river to headwaters). Water quality protection measures, particularly total dissolved solids, should be identified in the NEPA document.

